

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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ANGEL SULLIVAN-BLAKE and HORACE  
CLAIBORNE, on behalf of themselves and  
others similarly situated,

Plaintiffs,  
v.

FEDEX GROUND PACKAGE SYSTEM,  
INC.,

Defendant

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: Civil Action No. 2:18-cv-01698-RJC  
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**JOINT STATUS REPORT**

The parties submit the following joint status report to advise the Court of the current status of discovery:

1. In the parties' previous report, Dkt. 170, Plaintiffs estimated that the parties would know the identities of opt-ins in this matter by September 8, 2020, and that the parties would confer and submit joint (or competing) proposals for representative discovery of these opt-ins no later than October 23, 2020.

2. Plaintiffs filed their most recent Notice of Filing of Opt-In Forms on September 22, 2020. Dkt. 184.

3. Accordingly, the parties require additional time to confer and submit joint (or competing) proposals for representative discovery of the opt-ins. The parties therefore propose filing such proposal(s) with the Court no later than November 16, 2020.

4. The parties are also proceeding with the written discovery of the initial 57 opt-ins as outlined in the parties' previous report. See Dkt. 151. Plaintiffs' counsel has been able to provide FedEx Ground with completed questionnaires from a significant number of drivers but has encountered unexpected delays in obtaining documents and completed questionnaires from many of these drivers. Additionally, despite several months of efforts, Plaintiffs' counsel has been unable to reach some of the drivers to obtain their questionnaire responses and ultimately may not be able to obtain them. The parties have been working cooperatively on these issues thus far and will continue to confer as to how to resolve them. The parties will file a proposed revised schedule for discovery of these opt-ins no later than November 16, 2020.

Dated: October 23, 2020

Respectfully submitted,

/s/ Shannon Liss-Riordan  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served by electronic filing on October 23, 2020, on all counsel of record.

/s/ Shannon Liss-Riordan  
Shannon Liss-Riordan